

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ANGEL LOPEZ-GUZMAN,
Defendant.

No. 1:24-CR-00148

(Judge Wilson)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

21 U.S.C. § 841(a)(1)

(Possession with Intent to Distribute a Controlled Substance)

On or about January 5, 2024, in Lebanon County, Pennsylvania,
within the Middle District of Pennsylvania, the defendant,

ANGEL LOPEZ-GUZMAN,

did knowingly and intentionally possess with intent to distribute 500
grams and more of a mixture or substance containing a detectable
amount of cocaine, its salts, optical and geometric isomers, and salts of
isomers, a Schedule II controlled substance.

Before **ANGEL LOPEZ-GUZMAN** committed the offense charged
in this count, **ANGEL LOPEZ-GUZMAN** had a final conviction for a
serious drug felony, namely, a conviction under Title 35 Pennsylvania

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PER [Signature]
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Consolidated Statutes § 780-113(a)(30), for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 2

18 U.S.C. § 922(g)(1)
(Unlawful Possession of a Firearm)

On or about January 5, 2024, in Lebanon County, within the Middle District of Pennsylvania, the defendant,

ANGEL LOPEZ-GUZMAN,

knowing he had been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate commerce a firearm, that is, a Smith & Wesson .38 Special revolver with serial number AVU3550.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 3

18 U.S.C. § 924(c)

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about January 5, 2024, in Lebanon County, within the Middle District of Pennsylvania, the defendant,

ANGEL LOPEZ-GUZMAN,

did knowingly possess a firearm, that is, a Smith & Wesson .38 Special revolver with serial number AVU3550, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute a Controlled Substance in violation of Title 21 U.S.C. §841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

THE GRAND JURY FURTHER CHARGES:

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1–3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

2. Upon conviction of the offense in violation of Title 21, United States Code, Section 841(a)(1), Title 18, United States code, Section 922(g)(1), or Title 18, United States Code, Section 924(c), set forth in Counts 1-3 of this Indictment, the defendant,

ANGEL LOPEZ-GUZMAN,

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853 and Title 18, United States code, Section 924(d), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses; any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. a .38 caliber Smith & Wesson revolver with serial number AVU3550 and any associated ammunition.

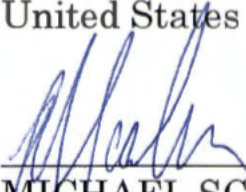
3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to 21 United States Code, Section 853 and Title 18, United States Code, Section 924(d).

GERARD M. KARAM
United States Attorney


MICHAEL SCALERA
Assistant United States Attorney

A TRUE BILL

FOREPERSON

6/12/24
Date